

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA**

JUSTIN W. JENKINS,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
CORTEVA, INC.,
CHS, INC.,
and
NUTRIEN AG SOLUTIONS, INC.,

Defendants.

Case No. 1:22-CV-1976-RLY-DLP

**DECLARATION OF VERN
HAWKINS IN SUPPORT OF
SYNGENTA'S MOTION TO
TRANSFER THE CASES TO THE
UNITED STATES DISTRICT
COURT FOR THE MIDDLE
DISTRICT OF NORTH
CAROLINA**

I, Vern Hawkins, declare as follows:

1. I am the President of Defendant Syngenta Crop Protection, LLC ("Syngenta") and the Regional Director of Syngenta's North American Crop Protection business. In my role at Syngenta, I oversee Syngenta's sales and marketing operations in the United States with respect to its crop protection products.

2. I have personal knowledge of the facts stated in this declaration or have become aware of such facts through my role at Syngenta. If called upon to testify, I could and would competently testify thereto.

3. I understand that Syngenta has been named as a defendant in 11 actions across two different courts, in North Carolina and in Indiana, all of which arise out of the same alleged

facts and all of which assert overlapping claims. I further understand that the first lawsuit was filed by the United States Federal Trade Commission and 10 state attorneys general in the Middle District of North Carolina, and that all subsequent lawsuits were filed as putative class actions by consumers in either the Middle District of North Carolina or the Southern District of Indiana.

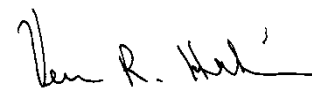
4. As described herein, Syngenta's operations as relevant to the subject matter of the complaints are based in the Middle District of North Carolina. The majority of the relevant employees and documents related to the subject matter of the complaints are also likely to be located in the Middle District of North Carolina.

5. Syngenta's headquarters and principal place of business is in Greensboro, North Carolina, located within the Middle District of North Carolina. Syngenta's employees who have responsibility for the business decisions related to the conduct alleged in the complaints are predominantly based in Greensboro, North Carolina. The committees and teams in which these individuals participate and that have responsibilities related to the conduct alleged in the complaints sit in Greensboro, North Carolina.

6. None of the individuals with decision-making responsibility related to the conduct alleged in the complaints are located in the Southern District of Indiana.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 22, 2022

A handwritten signature in black ink, appearing to read "Vern R. Hawkins", is written over a horizontal line.

Vern Hawkins